PERMIT AMENDMENT NO. 3496-115-0068-S-06-1
ISSUANCE DATE:

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Air Quality – Permit Amendment

In accordance with The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to or in effect under that Act, Permit No. 3496-115-0068-S-06-0 issued on December 17, 2015 to:

Facility Name:	**Bekaert Corporation**
Facility Address:	**301 Darlington Drive, SW** **Rome, Georgia 30161 Floyd County**
Mailing Address:	**301 Darlington Drive** **Rome, Georgia 30161**
Facility AIRS Number:	**04-13-115-00068**

for the following: The operation of a steel wire cord and bead wire manufacturing facility.

is hereby amended as follows: To vent insignificant amount of VOC emissions directly into atmosphere (without RTO control) during malfunction to prevent explosion.

Reason for Amendment: Application No. 28689 dated March 9, 2023

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 2 page(s).

This Permit Amendment is hereby made a part of Permit No. 3496-115-0068-S-06-0 and compliance herewith is hereby ordered. Except as amended hereby, the above referenced Permit remains in full force and effect.

STATE OF GEORGIA
CONSTITUTION
WISDOM
JUSTICE
MODERATION
1776

Richard E. Dunn, Director
Environmental Protection Division

4. Process & Control Equipment

Modified Condition:

4.2 The Permittee shall ensure that emissions from the Cumar Coating Lines are controlled by the Regenerative Thermal Oxidizer at all times that any Cumar Coating Line is in operation, except during any malfunctions that leave VOC-laden gases trapped in the piping between the coating line and the Regenerative Thermal Oxidizer, in which case the trapped gases may be vented uncontrolled to the atmosphere.

7. Notification, Reporting and Record Keeping Requirements

Modified Condition:

7.2 The Permittee shall use the following protocols to estimate the monthly VOC and HAP emissions in Conditions 7.3 and 7.5.

a. For Cumar Coating Lines, the monthly VOC/HAP emissions (E_{CCL} for VOC) are calculated as the mass balance (100 percent loss) of VOC/HAP contained in all coatings, coating additives, and solvents used during the month, as reduced by the overall control efficiency (OCE) of Regenerative Thermal Oxidizer R01, as depicted in the following equation:

E_{RTO} (tons) = (Material usage (lbs)(Weight % VOC or HAP)(1-OCE)/2000 lbs/ton

The Permittee shall use the OCE demonstrated during the most recent Division-approved performance test. During periods of regenerative thermal oxidizer malfunction, as defined in Condition 7.7, the Permittee shall assume the destruction efficiency of the control device is zero.

$E_{CCL} = E_{RTO} + 0.066n$

Where:

E_{CCL} = Monthly VOC emission rate from the Cumar Coating Lines, in tons per month.

0.066 = VOC vented to the atmosphere before re-start due to the malfunction, in tons per time.

n = Number of time while gases vented to the atmosphere before the RTO re-start due to the malfunction.

b. For all VOC/HAP-containing materials not used on the Cumar Coating Lines (excluding HCl pickeling), the monthly VOC emissions are calculated as the mass balance (100 percent loss) of VOC contained in all coatings, coating additives, and solvents used during the month.

c. To estimate HAP emissions from HCl pickling operations (i.e., HCl emissions), the Permittee shall multiply the hours of operation of each pickling operation during the month times the hourly emission rate for each pickling scrubber, as determined through the most recent, Division-approved performance test.

Added Condition:

7.13 The Permittee shall keep a log of number of times each month while exhaust from the Cumar Coating Line is vented to the atmosphere uncontrolled due to malfunction.